

Exhibit 70

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

CARYN DEVINS STRICKLAND,

Plaintiff,

v. Civil No.: 1:20-cv-00066-WGY

UNITED STATES, et al.,

Defendants.

VIDEOTAPED

DEPOSITION OF: ANTHONY MARTINEZ

TAKEN: By Counsel for Plaintiff

DATE: April 28, 2023

TIME: 9:00 a.m. - 5:41 p.m.

PLACE: Constangy, Brooks, Smith &
Prophete
100 North Tampa Street
Suite 3350
Tampa, Florida 33602

REPORTED BY: Sarah Parker
Notary Public
State of Florida at Large



RICHARD LEE REPORTING

rlr@richardleereporting.com

1 THE WITNESS: Okay. Thank you.

2 EXAMINATION

3 BY MS. WESTMORELAND:

4 Q. Okay. So who was the head of the appellate
5 unit while you were the federal defender?

6 A. Josh Carpenter.

7 Q. And did you ever have him reporting
8 directly to you, rather than to JP and you?

9 A. Yes, there came a point in time where I
10 modified -- I modified the organizational chart so
11 that he could be reporting directly to me.

12 Q. At the time that you made that change, was
13 Caryn reporting to Josh?

14 A. Correct.

15 Q. Can you dig out Exhibit 59 for me?

16 A. I've got it.

17 Q. Do you think it would have been a
18 reasonable interpretation of this e-mail as asking
19 for sexual favors?

20 A. No.

21 Q. Would you consider that a misinterpretation
22 of the e-mail?

23 A. Yes.

24 Q. And then can you pull out Exhibit 68 for
25 me?